

 <b>Nuclear Department Corporate Directive</b>	CD 2.1	Revision: 4
	Issue Date: 5/22/2009	
	Page 1 of 14	
Title: <b>Nuclear Oversight</b>		
Approval: <b>Michael D. Werner</b> General Manager Nuclear Oversight		

# **Table of Contents**

	<u>Page</u>
<b>1.0 PURPOSE.....</b>	<b>3</b>
<b>2.0 APPLICABILITY .....</b>	<b>3</b>
<b>3.0 RESPONSIBILITIES.....</b>	<b>3</b>
<b>4.0 DEFINITIONS .....</b>	<b>5</b>
<b>5.0 REQUIREMENTS .....</b>	<b>7</b>
<b>5.1 GENERAL .....</b>	<b>7</b>
<b>5.2 HEADQUARTER QA PROGRAM ADMINISTRATION.....</b>	<b>9</b>
<b>5.3 INTERNAL ASSESSMENT .....</b>	<b>9</b>
<b>5.4 QUALITY CONTROL .....</b>	<b>10</b>
<b>5.5 SUPPLIER ASSESSMENT .....</b>	<b>10</b>
<b>5.6 NUCLEAR OVERSIGHT COMMITTEE (NOC) AND MANAGEMENT AND         SAFETY REVIEW COMMITTEE (MSRC) MANAGEMENT.....</b>	<b>11</b>
<b>5.7 TRAINING COMMITTEES .....</b>	<b>11</b>
<b>5.8 PARTICIPATION IN LINE PRODUCTION ACTIVITIES .....</b>	<b>12</b>
<b>6.0 RECORDS .....</b>	<b>12</b>
<b>7.0 REFERENCES.....</b>	<b>13</b>
<b>7.1 SOURCE DOCUMENTS .....</b>	<b>13</b>
<b>7.2 REFERENCE DOCUMENTS .....</b>	<b>13</b>
<b>7.3 COMMITMENTS.....</b>	<b>13</b>
<b>8.0 REVISION SUMMARY .....</b>	<b>13</b>
<b>9.0 ATTACHMENTS.....</b>	<b>13</b>
<b>ATTACHMENT 1 .....</b>	<b>14</b>

<b>Nuclear Oversight</b> CD 2.1	Revision: 4 Page 3 of 14
------------------------------------	-----------------------------

**1.0 PURPOSE**

This directive describes Nuclear Oversight’s assigned roles and responsibilities within the Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, referred to as NSPM, and the structure that Nuclear Oversight has established for implementing these roles and responsibilities effectively and efficiently.

**2.0 APPLICABILITY**

This directive is applicable to Nuclear Oversight activities.

**3.0 RESPONSIBILITIES**

**3.1** Executive Officer responsible for Nuclear Oversight

**3.2** General Manager Nuclear Oversight

**3.2.1** Overall management of Nuclear Oversight Organization.

**3.2.2** Advocating, prioritizing and managing programs in the areas of:

1. Headquarter Quality Assurance Program Administration
2. Internal Assessment
3. Quality Control
4. Supplier Assessment
5. Nuclear Oversight Committee (NOC) and Management and Safety Review Committee (MSRC) Administration
6. Receipt Inspection

**3.2.3** Ensuring that Nuclear Oversight Programs comply with regulatory and licensing requirements.

**3.2.4** Representing NSPM to external parties for issues related to Quality Assurance Programs.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 4 of 14</p>
---	--

- 3.2.5** Providing management and guidance to site Nuclear Oversight Managers.
- 3.2.6** Ensuring adequate headquarter and site staffing to carry out the core business of Nuclear Oversight.
- 3.2.7** Setting performance expectations for Nuclear Oversight Managers.
- 3.2.8** Managing Nuclear Oversight budget.
- 3.3** NOS Program Manager
  - 3.3.1** Maintaining NSPM-1, the NSPM Quality Assurance Topical Report (QATR). This document serves as the sole Quality Assurance Program Description for all NSPM sites.
  - 3.3.2** Providing interpretation and guidance with respect to compliance with the NSPM Quality Assurance Program.
  - 3.3.3** Providing oversight of any quality related activities performed or controlled in the headquarter offices.
  - 3.3.4** Administering the fleet NOS training program.
  - 3.3.5** Managing centralized Supplier Assessment activities including audits, source surveillances, commercial grade surveys and project support (including fuels oversight). This involves maintaining NSPM Representation on Nuclear Procurement Issues Committee (NUPIC) and Nuclear Energy Institute (NEI) AA/FFD Industry work groups.
  - 3.3.6** Implementing assigned responsibilities identified in Supply Chain Fleet Procedures.
  - 3.3.7** Managing Nuclear Oversight supplier assessment budget.
  - 3.3.8** Administering the Qualified Supplier List (QSL).
  - 3.3.9** Identifying, communicating, and assisting in the resolution of gaps in Nuclear Oversight process performance.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 5 of 14</p>
---	--

- 3.3.10** Maximizing efficiency and cost effectiveness through standardization in Nuclear Oversight activities across the fleet.
- 3.3.11** Establishing, maintaining and enhancing Nuclear Oversight process performance indicators.
- 3.3.12** Assisting General Manager NOS in developing and implementing executive level status reporting of NSPM fleet performance as determined by Nuclear Oversight assessment and inspection activities.
- 3.3.13** Serving as point of contact for resource exchanges with outside entities (e.g., Nuclear Industry Evaluation Program (NIEP)).
- 3.4** NOS Site Manager
  - 3.4.1** Managing the NOS internal assessment programs at their assigned site.
  - 3.4.2** Managing the Nuclear Oversight quality control and receipt inspection programs at their assigned site.
  - 3.4.3** Approving oversight plans for major site projects and supplying appropriate resources to support oversight.
  - 3.4.4** Making site performance data collected through various Nuclear Oversight activities available to the Site Performance Assessment function for developing an overall picture of Site Performance.
  - 3.4.5** Setting performance expectations for personnel under their direction.
  - 3.4.6** Managing the site portion of the Nuclear Oversight budget.

## **4.0 DEFINITIONS**

- 4.1** **Internal Assessment:** A formal process used by NOS to examine and evaluate site performance against one or more established criteria. The assessments are intended to identify strengths and weaknesses in the areas of performance, compliance, and overall plant safety. For the purposes of the internal assessment program, the terms 'audit' and 'assessment' are synonymous.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 6 of 14</p>
---	--

- 4.2 PEACH:** Alternative title for the Employee Integrated Issues Resolution Process which consists of the following elements: Professional Opinions (Differing), Employee Concerns, Action Requests, Code of Conduct Issues, Human Resource Issues.
- 4.3 Management and Safety Review Committee (MSRC):** Committee established for each plant operated by NSPM, which is responsible for providing safety overview of nuclear activities at the NSPM operated nuclear plant. Each MSRC reports to the Vice President, Chief Nuclear Officer.
- 4.4 NSPM Quality Assurance (QA) Program:** The overall program consisting of the compilation of NSPM-1, Corporate Directives, Headquarter Department Procedures, Fleet Procedures and each generating site's implementing documents
- 4.5 Nuclear Oversight Committee (NOC):** Committee established with responsibility for providing an independent high-level review of the operation of the nuclear power plants subject to the Nuclear Power Plant Operating Services Agreement with NSPM. The NOC reports to the NSPM Board of Directors.
- 4.6 Quality Assurance (QA):** All those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.
- 4.7 Quality Assurance Program (QAP):** Written documents that provide control over activities affecting quality to an extent consistent with their importance; and that identify activities and items to which they apply.
- 4.8 Quality Assurance Topical Report (QATR):** The highest level description of NSPM's quality assurance program controls and commitments regarding quality assurance for its individual generating sites and support functions. NSPM-1, the QATR, is the Quality Assurance Program Description as defined in 10CFR 50.54.
- 4.9 Quality Control (QC):** Those functionally independent quality assurance actions that review, inspect, check and document whether items, processes, services or documents conform to specified requirements. The method and extent of verification is commensurate with the activity's relative importance to safety and reliability.
- 4.10 Quality Receipt Inspection:** Those functionally independent quality assurance actions that review, inspect, check and document the conformance of procured materials to specified requirements.
- 4.11 Qualified Supplier List (QSL):** The NSPM computer information database containing a listing of suppliers evaluated for use for providing safety- related or augmented quality items or services.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 7 of 14</p>
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## **5.0 REQUIREMENTS**

### **5.1 GENERAL**

**5.1.1** The Vision of Nuclear Oversight is to provide excellence in independent oversight of nuclear operations.

**5.1.2** The Mission of Nuclear Oversight is to:

- Identify strengths and weaknesses in the implementation of the Quality Assurance Program (Core Business),
- Provide meaningful analysis and insight, and
- Drive continuous improvement in nuclear operations.

**5.1.3** Nuclear Oversight accomplishes its mission through a combination of compliance, performance and effectiveness-based assessments.

1. Nuclear Oversight assesses the implementation of the Quality Assurance Program, verifies compliance to Quality Assurance Program requirements, and evaluates the technical and economic appropriateness of nuclear operations.
2. Nuclear Oversight conducts its assessments through performance/effectiveness-based monitoring of the processes that implement the Quality Assurance Program requirements.
3. When weaknesses in Quality Assurance Program implementation are identified during the conduct of Nuclear Oversight assessment activities, Nuclear Oversight endeavors to characterize the significance of the problem; identify the causes and/or contributors; and communicate insights into the organizational problems that allowed the weakness to exist.
4. Nuclear Oversight uses a practical and reasonable approach to examine aspects of the site QA program commensurate with their significance to site operational safety and plant reliability.
5. Nuclear Oversight reviews selected issues identified by external agencies using the Assessment Effectiveness Review process to assure process integrity and effectiveness.
6. Nuclear Oversight conducts periodic self-assessments of its activities to assure process integrity and effectiveness.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 8 of 14</p>
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7. Nuclear Oversight establishes performance indicators in the areas of:

- Program effectiveness
- Process efficiency
- Job Performance

**5.1.4** Nuclear Oversight SHALL have the authority and responsibility to stop a specific work activity, type of work activity, or the continuation of a project when it is determined that further work may:

1. Negatively affect personnel or nuclear safety (significant hazard to the health and safety of the public); or
2. Lead to a reportable violation of Technical Specifications or other License requirements; or
3. Cause equipment damage; or
4. Preclude further investigation/evaluation; or
5. Preclude effective corrective action; or
6. Result in significant negative economic consequences (delays, repairs, rework).

This responsibility and authority includes authority to control further processing, delivery, installation, operation or use of nonconforming items.

**5.1.5** The Site Vice-Presidents, General Manager Nuclear Oversight, and the Vice President, Chief Nuclear Officer are the primary customers for Nuclear Oversight. Nuclear Oversight works with the Site Vice President's direct reports to drive continuous improvement in nuclear operations. A reporting chain, independent of site management, ensures an appropriate path for communicating site performance and escalating identified issues (See Attachment 1).

**5.1.6** Nuclear Oversight accomplishes its mission independent of the pressures and constraints of production.

1. Nuclear Oversight General Manager/Managers have sufficient authority, organizational freedom, and resources to implement their assigned responsibilities. They have no unrelated duties that would preclude full attention thereto.



<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 9 of 14</p>
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2. Nuclear Oversight staffs have authority to obtain access to records and personnel as needed to perform assessments or inspections.
3. Nuclear Oversight assessors and quality control inspectors SHALL NOT be assigned to assess/inspect processes or materials for which they have cost or scheduling responsibilities.
4. Nuclear Oversight assessors and quality control inspectors SHALL NOT be accountable for negative impact on cost or schedule resulting from issues they identify; nor discriminated against for raising such issues.

**5.1.7** Nuclear Oversight has responsibility for providing site performance related information to the Site Performance Assessment function for the purposes of developing an overall picture of Site performance. Nuclear Oversight Managers work with their Performance Assessment counterparts to drive for continuous improvement in plant operations. Nuclear Oversight participation in the Performance Assessment function SHALL NOT conflict with Nuclear Oversight's ability to carry out its core business. If a conflict arises, Nuclear Oversight Managers are expected to promptly escalate the issue.

## **5.2 HEADQUARTER QA PROGRAM ADMINISTRATION**

**5.2.1** NOS, through the NOS Program Manager, SHALL administratively control the following document:

1. Quality Assurance Topical Report, NSPM-1

**5.2.2** Administration includes:

1. Responsible for content
2. Responsible for reviews, approvals and interpretations
3. Responsible for arranging for distribution

## **5.3 INTERNAL ASSESSMENT**

**5.3.1** Internal Assessment SHALL be implemented in accordance with NOS department procedures.

**5.3.2** The Internal Assessment Program SHALL identify strengths and weaknesses in the implementation of the Quality Assurance Program that enables the Site to continuously improve in areas relative to operation and maintenance of the plant.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 10 of 14</p>
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- 5.3.3** The Internal Assessment Program SHALL use the site Corrective Action Program to report deficiency and improvement opportunities identified through the conduct of assessments. In some cases, due to sensitivity of the identified issue, other avenues of issue resolution may be more appropriate (e.g. PEACH).

## **5.4 QUALITY CONTROL**

- 5.4.1** Nuclear Oversight SHALL administer and implement the Quality Control Inspection Program at the sites.
- 5.4.2** Nuclear Oversight SHALL administer and implement the Receipt Inspection Program at the sites.
- 5.4.3** The QC function SHALL be conducted in accordance with the requirements of NSPM-1.
- 5.4.4** QC functions SHALL be implemented in accordance with applicable fleet and site procedures.
- 5.4.5** The receipt inspection program SHALL be implemented in accordance with the process described in applicable Supply Chain fleet and site procedures.
- 5.4.6** Nuclear Oversight SHALL maintain site testing and inspection procedures used in conjunction with the Supply Chain fleet procedures at sites for which Nuclear Oversight is responsible for receipt inspection.
- 5.4.7** The Quality Control Program SHALL identify strengths and weaknesses in the implementation of the Quality Assurance Program that enables the Site to continuously improve the work control process.

## **5.5 SUPPLIER ASSESSMENT**

- 5.5.1** A common Supplier Assessment Program SHALL be maintained in accordance with the requirements of NSPM-1 and applicable licensing commitments.
- 5.5.2** The Supplier Assessment Program SHALL be conducted in accordance with Nuclear Oversight Supplier Assessment fleet procedures, which interface with the NSPM Procurement Process, as described in the applicable Supply Chain fleet procedures.
- 5.5.3** Maintain Supplier Assessment fleet procedures used in conjunction with Supply Chain fleet procedures.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 11 of 14</p>
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**5.5.4** The Supplier Assessment program monitors supplier activities through audits, surveillances, and surveys; and provides information to the site related to quality of supplier programs and activities to enable the site to select appropriate qualified vendors and suppliers.

**5.5.5** Supplier Assessment SHALL maintain a system for documenting and tracking supplier deficiencies identified as part of Supplier Assessment activities.

**5.5.6** Supplier Assessment SHALL maintain a system for documenting and tracking performance of suppliers approved for use by NSPM (e.g. Qualified Supplier List). The system SHALL be available to site personnel and headquarter personnel, as needed, for procurement functions.

## **5.6 NUCLEAR OVERSIGHT COMMITTEE (NOC) AND MANAGEMENT AND SAFETY REVIEW COMMITTEE (MSRC) MANAGEMENT**

**5.6.1** Headquarter Nuclear Oversight SHALL administer the NOC/MSRC functions, including maintenance and control of the NOC/MSRC Charters.

**5.6.2** Headquarter Nuclear Oversight SHALL ensure the MSRC Charter is consistent with NSPM Management expectations.

## **5.7 TRAINING COMMITTEES**

### **5.7.1 NOS Curriculum Review Committee (CRC)**

1. The CRC identifies and recommends to the Training Advisory Committee (TAC) the initial and continuing training needed to improve performance of NOS staff.
2. The NOS Program Manager chairs the CRC.
3. The CRC SHALL have a Charter Document that defines administrative requirements.

### **5.7.2 NOS Training Advisory Committee (TAC)**

1. The TAC is responsible for providing oversight of the initial and continuing training programs for NOS staff.
2. The NOS Program Manager chairs the TAC.

<p style="text-align: center;"><b>Nuclear Oversight</b></p> <p style="text-align: center;">CD 2.1</p>	<p>Revision: 4</p> <p>Page 12 of 14</p>
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3. The TAC SHALL have a Charter Document that defines administrative requirements.

- 5.7.3 The function of the CRC and TAC may be combined, provided the intent of both functions is satisfied including supervisory and manager level participation.

## 5.8 PARTICIPATION IN LINE PRODUCTION ACTIVITIES

- 5.8.1 Nuclear Oversight may commit resources in support of line activities (such as helping to staff refueling outages and emergency response organization duty, self-assessments, and causal evaluations) as long as Nuclear Oversight is able to continue to carry out its core business. The needs of the Line Organization must be balanced against the requirements of this directive. Assignment of resources SHALL NOT compromise the Nuclear Oversight organization's ability to provide effective independent assessment and inspection activities. If a conflict exists, it is expected that the Nuclear Oversight Manager promptly escalate the issue to the General Manager Nuclear Oversight.
- 5.8.2 During an occasional assignment to the Line Organization, Nuclear Oversight personnel SHALL conduct their activities under the procedures that govern the assigned activity.
- 5.8.3 Nuclear Oversight personnel should not act in an approval role for the line organization within the Corrective Action Program.
- 5.8.4 Nuclear Oversight SHALL NOT chair Action Request Groups (e.g., Screening Teams, Technical Review Panels, Corrective Action Review Boards), or On-site Review Committees/Subcommittees.
- 5.8.5 Nuclear Oversight personnel should not be called upon to lead root causes/focused self-assessments at their sites. The General Manager Nuclear Oversight will approve all assignments regarding NOS personnel's role in leading root causes and focused self-assessments.

## 6.0 RECORDS

None

**7.0 REFERENCES**

**7.1 SOURCE DOCUMENTS**

None

**7.2 REFERENCE DOCUMENTS**

**7.2.1** NSPM-1, Quality Assurance Topical Report

**7.2.2** CD 1.1, “NSPM Quality Assurance Program Structure”

**7.2.3** ASME NQA 1 – 1994, Quality Assurance Requirements for Nuclear Facility Applications

**7.3 COMMITMENTS**

None

**8.0 REVISION SUMMARY**

Section	Change
Various	Titles and terminology changes due to transition to NSPM/Xcel Energy Nuclear Department.

**9.0 ATTACHMENTS**

**9.1** Attachment 1, NSPM Nuclear Oversight Organization

**ATTACHMENT 1**

**NSPM Nuclear Oversight Organization**

